

IN THE UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

AD HOC SHRIMP TRADE ACTION)	
COMMITTEE,)	
)	
Plaintiff-Appellee,)	
)	
v.)	2014-1647
)	
UNITED STATES,)	
)	
Defendant-Appellee,)	
)	
and)	
)	
HILLTOP INTERNATIONAL,)	
OCEAN DUKE CORP.,)	
)	
Defendants-Appellants.)	

ORDER

Upon consideration of defendant-appellee United States' consent motion for an extension of time for appellees to file the response briefs in this appeal, it is hereby

ORDERED that the United States' consent motion is granted, and it is further

ORDERED that appellees, the United States and Ad Hoc Shrimp Trade Action Committee, shall file their response briefs in this appeal on or before November 24, 2014.

FOR THE COURT:

Dated: _____, 2014
Washington, D.C.

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)	
Defendants-Appellants.)	

DEFENDANT-APPELLEE'S CONSENT MOTION FOR AN
EXTENSION OF TIME FOR PARTIES TO FILE RESPONSE BRIEFS

Pursuant to Rules 26(b) and 27 of the Federal Circuit Rules, defendant-appellee, the United States, respectfully requests that the Court grant an extension of time of 21 days, to and including November 24, 2014, for the appellees in this appeal (the Government and Ad Hoc Shrimp Trade Action Committee) to file their response briefs. The response briefs are currently due on November 3, 2014. We have not previously requested an extension of time for this purpose. We have conferred with counsel for the other parties to the appeal, each of whom consented to our request.

Good cause exists to grant the extension we are requesting because we require additional time to coordinate the contents of the Government's response brief with the Department of Commerce, and because counsel of record is balancing work on this matter with commitments in numerous other matters that require a substantial amount of counsel's attention. Specifically, in the time period covered by the extension we are requesting, counsel expects to work on matters including: (1) coordination of the Government's opposition brief to be filed with this Court in *Howard v. Department of the Air Force*, Consol. Fed. Cir. No. 2014-3116, 2014-3121 (currently due October 24, 2014); (2) oral argument before this Court in *Apex Exports and Falcon Marine Exports Ltd. v. United States*, Fed. Cir. No. 14-1234, Ct. Int'l Trade No. 11-0291 (scheduled for November 3, 2014); (3) coordination of the Government's response to the plaintiff's motion for reconsideration in *Papierfabrik August Koehler SE v. United States*, Ct. Int'l Trade No. 13-0163 (currently due November 3, 2014); and (4) work on several other miscellaneous matters, including several *pro se* matters currently pending before this Court. The extension of time we are requesting will thus enable us to better assist the Court in resolving the appeal by providing a thorough and thoughtful response to the arguments made by the appellant. So that the parties' deadlines in this matter will remain comparable, we also request that the extension be applied equally to all appellees, including Ad Hoc Shrimp Trade Action Committee.

Accordingly, we respectfully request that the Court grant our motion for an extension of time, to and including November 24, 2014 for appellees to file their response briefs in this matter.

Respectfully submitted,

JOYCE R. BRANDA
Acting Assistant Attorney General

JEANNE E. DAVIDSON
Director

/s/ Patricia M. McCarthy
PATRICIA M. MCCARTHY
Assistant Director

/s/ Joshua E. Kurland
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October 24, 2014

Attorneys for Defendant-Appellee
United States

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Defendants-Appellants.)	

DECLARATION OF JOSHUA E. KURLAND

I, Joshua E. Kurland, state the following:

1. I am an attorney with the Department of Justice, Civil Division, Commercial Litigation Branch, Washington, D.C. In that capacity, I am counsel of record in *Ad Hoc Shrimp Trade Action Committee v. United States*, Fed. Cir. No. 2014-1647.

2. Good cause exists to grant the extension we are requesting because we require additional time to coordinate the contents of the Government's response brief with the Department of Commerce, and because I am balancing work on this

matter with commitments in numerous other matters that require a substantial amount of my attention.

3. Specifically, in the time period covered by the extension we are requesting, I expect to work on matters including: (1) coordination of the Government's opposition brief to be filed with this Court in *Howard v. Department of the Air Force*, Consol. Fed. Cir. No. 2014-3116, 2014-3121 (currently due October 24, 2014); (2) oral argument before this Court in *Apex Exports and Falcon Marine Exports Ltd. v. United States*, Fed. Cir. No. 14-1234, Ct. Int'l Trade No. 11-0291 (scheduled for November 3, 2014); (3) coordination of the Government's response to the plaintiff's motion for reconsideration in *Papierfabrik August Koehler SE v. United States*, Ct. Int'l Trade No. 13-0163 (currently due November 3, 2014); and (4) work on several other miscellaneous matters, including several *pro se* matters currently pending before this Court.

4. The extension of time we are requesting will thus enable us to better assist the Court in resolving the appeal by providing a thorough and thoughtful response to the arguments made by the appellant. So that the parties' deadlines in this matter will remain comparable, we also request that the extension be applied equally to all appellees, including Ad Hoc Shrimp Trade Action Committee.

/s/ Joshua E. Kurland
Joshua E. Kurland

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 24th day of October, 2014, a copy of the foregoing DEFENDANT-APPELLEE'S CONSENT MOTION FOR AN EXTENSION OF TIME FOR PARTIES TO FILE RESPONSE BRIEFS, DECLARATION OF JOSHUA E. KURLAND, and ORDER were filed electronically.

 X This filing was served electronically to all parties by operation of the Court's electronic filing system.

 A copy of this filing was served via:

 hand delivery

 mail

 third-party commercial carrier for delivery within 3 days

 electronic means, with written consent of the party being served

to the following address:

 /s/ Joshua E. Kurland